

LEVIN-EPSTEIN & ASSOCIATES, P.C.

420 Lexington Avenue • Suite 2525 • New York, New York 10170
T: 212.792-0048 • E: Jason@levinepstein.com

April 24, 2020

Via Electronic Filing

The Honorable Magistrate Judge Steven M. Gold
U.S. District Court Eastern District of New York
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singh v. Lintech Electric, Inc. et al*
Case No.: 1:18-cv-05780-FB-SMGJO

Dear Honorable Magistrate Judge Gold:

This law firm represents Defendants Lintech Electric, Inc. (the “**Company**”), and Linden J. Tudor (“**Mr. Tudor**”, and together with the Company, the “**Defendants**”) in the above-referenced action.

This law firm also represents Defendants Holly Tudor, Linden Tudor and Tudor Enterprise Family Limited Partnership in the removed state court actions captioned *Singh v. Holly Tudor et al* (Index No. 720551-2019) (the “**First Removed State Court Action**”) and *Singh v. Tudor Entr. Family Ltd Partnership et al* (Index No.: 526826-2019) (the “**Second Removed State Court Action**”, and together, the “**Removed State Court Actions**”).

Pursuant to Your Honor’s April 13, 2020 Minute Entry and Order, annexed hereto, the parties respectfully request that the Court enter the revised proposed protective order annexed hereto as Exhibit “A”, to ensure the confidentiality of certain information exchanged in this proceeding. This revised proposed protective order modifies paragraphs 2 and 18, as requested by Plaintiff’s counsel in his letter dated April 22, 2020.

This letter also serves to respectfully inform Your Honor that simultaneously with the filing of the instant letter, the undersigned has served Plaintiff’s counsel with the Notice of Motion, Memorandum of Law with accompanying affirmation and exhibits in support of Defendants’ Motion to Dismiss.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi
420 Lexington Avenue, Suite 2525
New York, NY 10170
Tel. No.: (212) 792-0048
Email: Jason@levinepstein.com
Attorneys for Defendants

VIA ECF: All Counsel